

## Successor Coeur d'Alene Custodial Trust

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### Via E-mail

January 26, 2016

Ms. Beth Sheldrake  
U.S. EPA  
1200 Sixth Ave.  
Suite 900  
Seattle, WA 98115

Mr. Bill Adams  
U.S. EPA  
1200 Sixth Ave.  
Suite 900  
Seattle, WA 98115

SUBJECT: 4th Quarter 2015 Report

Dear Beth and Bill:

Attached is the 4th Quarter 2015 Report for the Successor Coeur d'Alene Custodial Trust. The report consists of:

- A bulleted narrative of remediation activities and asset management
- A budget and expenditure spreadsheet
- A summary spreadsheet showing the values of the three accounts
- The quarterly investment and bank account statements from BlackRock and Wells Fargo (sent to Bill with the hard copy of this report).

I certify that the reports are true and accurate to the best of my knowledge, information, and belief.

Sincerely,



Dan Silver  
Trustee

cc: Dan Meyer

Enclosures

**Coeur d'Alene Trust**  
**4<sup>th</sup> Quarter 2015 Work Completed**

**IC Rock Dumps Construction**

- Completed final construction and inspections.
- Prepared and reviewed construction documentation and reporting.

**EFNM WCA Waste Placement, Reporting, and Expansion Design**

- Completed waste placement, expanded the south stockpile area, cleared the expanded quarry area, and completed clearing and grubbing in the WCA expansion footprint.
- Completed winterization of the site.
- Prepared and reviewed the WCA southern stockpile expansion summary report.
- Prepared the final 100% WCA expansion design, including plans, specifications, CQAP, QAPP, SSAP, and O&M Plan.

**Success Design**

- Prepared for and attended a 90% design review meeting and coordinated with agencies regarding design review comments.
- Prepared and reviewed 100% Success design documents.
- Prepared adit risk assessment memorandum.
- Coordinated regarding access agreements for 2016 work.
- Prepared and reviewed a cultural resources report.

**EFNM Infrastructure Construction for Success**

- Completed construction of Success and Tamarack haul roads including grading, compaction and placement of 3-inch minus road surfacing gravel.
- Installed roadside channels with check dams.
- Installed culverts under roadways as specified in plans and as directed in the field to control drainage.
- Finished seeding, fertilizing, and hydro-mulching. Prepared for final inspection.
- Prepared and reviewed construction report.

**Ninemile Program Management, Prioritization, and Planning**

- Prepared quarterly projections and quarterly report.
- Maintained photographs, FTP sites and document library.
- Maintained GIS databases.
- Coordinated O&M responsibilities for all completed projects. Conducted O&M inspections of the Osburn USBM site, the Rex channel, and the BCRA bridge; prepared documentation.
- Prepared and coordinated access agreements for 2016 work.
- Prepared environmental covenant for Mine Ventures properties.
- Prepared for and attended data management meeting with the EPA and coordinated database transfer from WQX to scribe.
- Prepared 2016 work plan and budget.
- Prepared prioritization and long-term budget memorandum. Prepared prioritization alternatives memorandum and tables.

- Attended long-term planning meeting with the EPA.
- Prepared metrics memorandum and graphics.
- Prepared for and attended the USFWS Programmatic Biological Assessment meeting.
- Completed Lessons Learned meetings with all consultants and construction contractors.

#### **NM-363 Area-Wide Investigation**

- Evaluated preliminary low flow loading analysis data.
- Prepared area-wide investigation report.

#### **Wallace District Mining Museum Site Research**

- Prepared and reviewed Tamarack No. 7, Standard-Mammoth Loading area, and the Flynn/Omaha/Joe Matt historical reports (by the Wallace District Mining Museum).

#### **BCR and EMFR Operations**

- Continued operation of repositories including BCR/BCRA and EMFR.
- Performed independent monthly site inspections of BCR/BCRA and EMFR including winterization site walks and coordination regarding shutdown and topsoil management.
- Began receiving topsoil and stockpiling at BCRA for future use.
- Prepared and reviewed weekly reports.
- Attended meeting to discuss the waste management document update.
- Developed approach and budget for repository operations in 2016.

#### **LBCR Construction and Reporting**

- Prepared and reviewed as-built CAD files.

#### **2015 LBCR Operations**

- Operated the LBCR repository.
- Performed independent monthly site inspections including a winterization site walk and coordination relating to rilling.
- Prepared and reviewed weekly reports.
- Prepared operations report.

#### **BCR Cap Evaluation**

- Prepared and reviewed BCR expansion and closure recommendations memorandum.
- Coordinated with contractors and prepared scopes of work for geotechnical investigation to support design of expansion.
- Performed geotechnical investigation.
- Prepare remedial design work plan.

#### **LBCR Annex (SVNRT Repository) Investigation and Design**

- Prepared for and attended meeting with the EPA regarding design options and initial investigation results.
- Imported analytical and field data and prepared investigation report.
- Coordinated pressure transducer installations and survey.
- Coordinated ARARs. Prepared and reviewed wetland and cultural resource memoranda.

- Prepared and reviewed alternatives memorandum.

### **BCRA Final Design and Construction of Repository and Access Road**

- Completed construction of BCRA repository.
- Prepared and reviewed final bridge, utility relocation, and repository construction summary memoranda.
- Prepared and reviewed as-built drawings and imported CAD files into the Coeur d'Alene Trust database.
- Prepared and reviewed BCRA RA completion report.
- Prepared and reviewed supplemental BCRA cultural resources memorandum.

### **Water Monitoring**

- Completed data review, validation, tabulation and import into the Trust database.
- Reviewed historical Canyon Creek files and summarized findings.
- Prepared Ninemile watershed RA Effectiveness Plan. Attended meeting with the EPA regarding RA Effectiveness.
- Reviewed the EPA's optimization review document.
- Coordinated regarding access needs in Canyon Creek.
- Conducted BCRA water monitoring.
- Conducted monitoring of WCA underdrains (dry).
- Installed and downloaded data from levelloggers at the LBCR Annex.
- Prepared Ninemile, Canyon Creek and BCRA monitoring reports.
- Updated the Trust's programmatic QAPP and incorporated RA-Effectiveness related sampling procedures.

### **Kahnderosa Campground Bank Remediation**

- No activities.

### **Lower Basin Pilot Project**

- Coordinated with the EPA and USFW regarding potential Rose Lake Lower Basin pilot project.
- Prepared QAPP and HASP for USFS property near Rose Lake.
- Prepared access agreement for property near Rose Lake.
- Coordinated with HRA and USFS regarding ARARs compliance.
- Reviewed sediment model.
- Prepared updated Lower Basin and programmatic HASPs.

### **Remedy Protection Projects Design and Construction**

- Prepared Mill Creek, Copper Street/Boulder Creek and Printer's Creek CQAPs.
- Prepared and reviewed Copper Street/Boulder Creek 60% design. Attended 60% design review meeting.
- Prepared and reviewed Printer's Creek and Mill Creek 90% design documents.
- Reviewed project submittals and prepared work change directives for McCarthy Creek, S. 2<sup>nd</sup> Street, Revenue Gulch, and Mill Road.
- Prepared Ninemile Side Gulches RA Work Plan.

- Prepared and reviewed Ninemile Side Gulches 100% design.
- Performed and observed construction at Revenue Gulch, Mill Road, S. 2<sup>nd</sup> Street and McCarthy projects. Prepared daily and weekly reporting for all sites.
- Produced SPAF and petroleum-contaminated soil (PCS) memorandums and coordinated and conducted PCS sampling at S. 2<sup>nd</sup> Street.
- Evaluated data and prepared a summary regarding soil sampled due to a potential for exceedance of Principal Threat Waste criteria.
- Prepared construction summary memoranda for Revenue Gulch, Mill Road and S. 2<sup>nd</sup> Street. Prepared data validation memorandum for same.
- Prepared S. 2<sup>nd</sup> Street, McCarthy and Revenue Gulch record drawings.
- Attended prefinal inspections at Mill Road, McCarthy and S. 2<sup>nd</sup> Street projects and prepared notices of substantial completion, punch lists and prefinal inspection reports.
- Prepared Silverton completion reporting.
- Coordinated installation of a staff gauge at Revenue Gulch.
- Reviewed HRA's Mill Road cultural resources monitoring report.
- Prepared construction summary memorandum, prefinal inspection report and notice of substantial completion for the McCarthy Creek project.

### **Basin Property Remediation Program**

- A total of 77 properties were completed for the 2015 program.
- Working on finalizing property files and red-lining record drawings.
- Continued editing the BPRP Scientific RFP.
- Began development of the year-end report.
- Developing the list of properties that are ready for 2016 construction.
- Coordinating with EPA and DEQ for the Trust's 2016 takeover of the responsibilities related to BPRP property sampling and plot plan development.
- Development of the documents necessary for bidding the 2016 takeover of the BPRP property sampling and plot plan development.

### **Limited Use Repository Design and Inspections**

- Prepared and reviewed construction summary report.

### **Roadway Improvement Program Design and Construction**

- Coordinated with the Roads Board on preparation of the 2016 Scope of Work and Budget.
- Coordinated with the Roads Board on development of the 2016 Work Orders for Engineering and Construction for Mullan, Wallace, Osburn, Shoshone County.
- Payment of invoices for 2015 Engineering and construction work completed to date for the cities of Mullan, Wallace, Osburn, Shoshone County and East Side Highway District.

## **Asset and Program Management**

- The Trust submitted a Work Plan and Budget for 2016, which EPA approved after revision.
- The Trust paid its annual property taxes during the quarter. Receipt of the tax invoices led to questions in both Kootenai and Shoshone County as to which properties the Trust had conveyed in 2015. The questions in Kootenai County have been resolved. Questions remain in Shoshone County about a set of mineral claims that the Trust believed it had transferred but the County believes has not properly been recorded.
- The Trust and Wells Fargo had a set of conversations regarding a proposed Power of Attorney and potential Successor Trustee that would take effect if the Trustee died or was incapacitated.
- The Trust prepared a Prioritization Memorandum to assist in EPA's long term strategic planning.
- The Trust and MFA met with EPA to review the annual performance metrics of the different work modules.
- The Trust met with its contractors for the annual Lessons Learned meeting and plans to incorporate those lessons in 2016 work.
- The value of the Trust increased by \$2.5 m during the quarter, but was down \$30.1m for the year. The total Trust value at year-end was \$483.4m.

**Coeur d'Alene Trust**  
**2015 Budget and Expenditures**  
**December 31, 2015**

**Coeur d'Alene Trust 2015 Expenditures**

Task	EPA- Approved Budget	Expended Through December 31	Projected Balance	Percent of EPA Budget Expended
Coeur d'Alene Trust Program Management	\$905,000	\$843,173	\$61,827	93%
Miscellaneous Cultural Resource Programmatic Assistance	\$30,000	\$35,178	\$2,059	117%
5-Year Review Assistance	\$75,000	\$17,481	\$32,519	23%
Mine and Mill Sites				
IC Rock Dump Construction	\$2,345,000	\$1,996,012	\$307,219	85%
EFNM WCA Waste Placement, Reporting, and Expansion Design	\$1,300,000	\$797,977	\$143,009	61%
Success Design	\$430,000	\$291,318	\$208,478	68%
EFNM Infrastructure Construction for Success	\$880,000	\$624,828	\$270,342	71%
Ninemile Basin Program Management, Prioritization, and Planning	\$200,000	\$219,685	\$60,315	110%
NM-363 Area-Wide Investigation	\$300,000	\$299,997	\$3	100%
WDMM Research	\$30,000	\$20,433	\$9,567	68%
Repositories				
Repository Operations - Big Creek Repository and East Mission Flats Repository	\$1,250,000	\$849,743	\$394,196	68%
Repository Construction and Reporting - LBCR	\$310,000	\$250,246	\$4,632	81%
Repository Operations - Lower Burke Canyon Repository	\$500,000	\$101,324	\$53,676	
Repository Cap Evaluation for EMF and BCR	\$80,000	\$78,429	\$94,097	98%
LBCR/SVNRT Options Analysis, SVNRT Access Design, SVNRT Investigation, and SVNRT 30% Design	\$1,100,000	\$610,369	\$206,202	55%
BCRA Final Design and Construction of Repository and Access Roads	\$1,350,000	\$724,351	\$549,967	54%
Water Monitoring - Groundwater and Surface Water	\$400,000	\$305,344	\$101,656	76%
Lower Basin Pilot Projects				
Kahnderosa Campground Plantings and Construction Reporting	\$10,000	\$53,054	\$1,128	531%
Unspecified Lower Basin Pilot Project	\$100,000	\$22,750	\$20,250	23%
Remedy Protection Projects - Design and Construction	\$4,300,000	\$3,468,916	\$402,152	81%
Basin Property Remediation Program - Including Large Commercial Properties	\$3,700,000	\$3,453,958	\$94,104	93%
Fill the Holes Repository Design	\$250,000	\$46,561	\$32,082	19%
Roadway Improvement Program - Design and Construction	\$4,424,000	\$4,053,144	\$198,712	92%
Subtotal	\$24,269,000	\$19,164,272	\$3,248,189	79%
Contingency	\$250,000	\$0	\$0	0%
Total	\$24,519,000	\$19,164,272	\$3,248,189	78%

**Coeur d'Alene Trust  
Account Values  
4th Quarter 2015**

	<b>4th Quarter 2015</b>			<b>4th Q Totals</b>	<b>2015 Totals</b>
	<i>General Work Account</i>	<i>Special Work Account</i>	<i>Custodial Account</i>		
<b>Beginning Account Value</b>	<b>\$ 439,021,533</b>	<b>\$ 41,752,864</b>	<b>\$ 50,000</b>	<b>\$ 480,824,397</b>	<b>\$ 513,553,943</b>
<b>BlackRock Investment Accounts</b>					
Beginning Account Value	\$ 428,609,587	\$ 41,752,864	\$ -	\$ 470,362,451	
Change in Value	\$ (1,495,892)	\$ 814,860	\$ -	\$ (681,032)	
Subtotal: Ending Balance	\$ 427,113,695	\$ 42,567,724	\$ -	\$ 469,681,419	
<b>Historical Wells Fargo Commercial Checking</b>					
Beginning Account Value	\$ 1,891,675			\$ 1,891,675	
Credits	\$ -			\$ -	
Debits	\$ (1,335,719)			\$ (1,335,719)	
Subtotal: Ending Balance	\$ 555,956	\$ -	\$ -	\$ 555,956	
<b>New Wells Fargo Commercial Checking</b>					
Beginning Account Value	\$ 3,000,735			\$ 3,000,735	
Credits	\$ 5,001,043			\$ 5,001,043	
Debits	\$ (5,440,241)			\$ (5,440,241)	
Subtotal: Ending Balance	\$ 2,561,537			\$ 2,561,537	
<b>Wells Fargo Commercial Savings</b>					
Beginning Account Value	\$ 5,519,535		\$ 50,000	\$ 5,569,536	
Deposits	\$ 10,000,000			\$ 10,000,000	
Net Transfer to Checking	\$ (5,000,000)			\$ (5,000,000)	
Credit Card Liabilities	\$ 782				
Interest	\$ 1,588		\$ 6	\$ 1,594	\$ -
Subtotal: Ending Balance	\$ 10,521,904		\$ 50,007	\$ 10,571,911	
<b>Quarter End Account Value</b>	<b>\$ 440,753,092</b>	<b>\$ 42,567,724</b>	<b>\$ 50,007</b>	<b>\$ 483,370,823</b>	<b>\$ 483,370,823</b>
<b>Quarterly/Annual Change in Value</b>				<b>\$ 2,546,426</b>	<b>\$ (30,183,120)</b>